

Hales, Dana

From: Walker, Dana
Sent: Wednesday, April 10, 2013 10:37 AM
To: Ateyeh, Laurel
Cc: Patel, Pravin; 'Furlan, Ronald'; Trulear, Brian; MacKnight, Evelyn
Subject: Upper Dublin Township Draft Permit (PA0029441)

Laurel,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has reviewed the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Upper Dublin Township
NPDES Number: PA0029441
EPA Received: March 15, 2013

Our records show that this is a major permit that discharges to an Unnamed Tributary to Sandy Run, and is affected by the Wissahickon Creek Watershed TMDL. We have chosen to perform a limited review based on the wasteload allocation (WLA) requirements of the approved TMDL and the requirements for WET. I have completed my review and offer the following comments:

1. The Fact Sheet should be revised to explain why the orthophosphate WLAs were only applied from April through July, and why (NO₂+NO₃)-N is only a monitoring requirement in the permit. The Fact Sheet for the previous permit discussed how the TMDL parameters were applied to the permit, and I would recommend that this explanation be continued in the Fact Sheet for this renewal.
2. The Fact Sheet indicates WET test failures - two failures each for Ceriodaphnia Dubia and Pimephales Promelas. Although the facility used the wrong dilution ratio series, at least three out of the four endpoint failures (those with an NOEC of 12.5% and 25%) represent reasonable potential to exceed the narrative WET criteria; therefore, WET limits should be imposed in the permit.

Please address the above and provide me with any changes to the draft permit and/or Fact Sheet / Pollution Report, if necessary. If you have any questions, give me a call.

Thank you,
Dana

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